

**Exhibit B**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. No. 22-11068 (JTD)

(Jointly Administered)

**ORDER ESTIMATING AND TEMPORARILY ALLOWING  
CLAIMS OF LAYERZERO LABS LTD., ARI LITAN, AND SKIP &  
GOOSE LLC FOR PURPOSES OF VOTING TO ACCEPT OR REJECT THE PLAN**

Upon consideration of the motion (the “Motion”)<sup>2</sup> of LayerZero Labs Ltd., Ari Litan, and Skip & Goose LLC for the entry of an order pursuant to Bankruptcy Rule 3018(a) estimating and temporarily allowing claims for purposes of voting on the Debtors’ Plan; and upon consideration of the record of the Chapter 11 Cases; and the Court having found that due and proper notice of the Motion has been given and no other or further notice of the Motion is required; and the Court having found that it has jurisdiction to consider the Motion under 28 U.S.C. §§ 1334 and 157, and the Amended Standing Order; and the Court having found that its consideration of the Motion and the relief requested therein is a core proceeding under 28 U.S.C. § 157(b) and that it may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of these proceedings and the Motion is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found and determined that the relief requested in the Motion and provided

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

for herein is in the best interest of the Debtors, their estates, and their creditors; and after due deliberation and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED as set forth herein.
2. Pursuant to Bankruptcy Rule 3018(a), (i) LayerZero's General Unsecured Claims are allowed in the aggregate amount of \$40,609,864 and (ii) Skip & Goose's U.S. Customer Entitlement Claims are allowed in the aggregate amount of \$1, solely for purposes of voting to accept or reject the Plan.
3. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation of this Order.